

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

RICHARD BRADDOCK,

Plaintiff,

vs.

ZAYCON FOODS, LLC, a Washington limited liability company; FRANK R. MARESCA, JANE DOE MARESCA and the marital community composed thereof; MICHAEL GIUNTA, JANE DOE GIUNTA and the marital community composed thereof; MIKE CONRAD, JANE DOE CONRAD and the marital community composed thereof; and ADAM KREMIN, JANE DOE KREMIN and the marital community composed thereof,

Defendants.

No. 2:16-cv-01756-TSZ

**JOINT STIPULATED MOTION TO  
EXTEND INDIVIDUAL DEFENDANTS'  
BRIEFING DEADLINE BY FOUR DAYS  
AND ORDER**

1 Plaintiff Richard Braddock and Defendants<sup>1</sup> Michael Giunta, Frank Maresca and Michael  
2 Conrad (collectively “Individual Defendants”), through their respective undersigned counsel, stipulate:

3 1. The parties filed motions for partial summary judgment on October 24, 2018, and  
4 October 25, 2018. Dkt. # 119, 124.

5 2. The Court issued a Minute Order on April 19, 2019, denying in part and deferring in  
6 part the motions for summary judgment and requested supplemental briefing. Dkt. # 155. On May 7,  
7 2019, the Court issued a second Minute Order with the controlling briefing schedule. Dkt. # 156.

8 3. The Court re-noted the summary judgment motions for June 7, 2019 and made  
9 “Defendants’ combined responsive brief” due June 7, 2019. *Id.*

10 4. Defendants request the Court extend their briefing deadline by four days – to June 13,  
11 2019.

12 5. Plaintiff stipulates to this request after being informed of Ms. Van Dessel’s unexpected  
13 sick days in the last week and of the multiple competing professional obligations of Individual  
14 Defendants’ respective counsel Mrs. Elsdon and Ms. Van Dessel (including a federal court criminal  
15 case that Ms. Van Dessel had to prioritize in light of an upcoming trial date and plea negotiations).  
16 Further, Ms. Van Dessel has to be in federal court in the EDWA on June 6, 2019 and possibly on  
17 June 7, 2019.

18 6. Counsel for Defendants, Mrs. Elsdon and Ms. Van Dessel, are the only counsel  
19 involved in filing a combined supplemental brief for Individual Defendants in response to the Court’s  
20 Order.

21 7. This extension is not sought for delay and this extension would not prejudice any party.  
22 This extension is requested only to ensure Individual Defendants are not prejudiced in their counsel’s  
23 inability to give the attention and time necessary to complete the supplemental briefing by June 7.

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28 <sup>1</sup> Defendant Adam Kremin was dismissed. Dkt. # 159.

Respectfully submitted this 5th day of June, 2019.

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By s/ David L. Tift

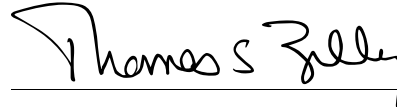
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1 **ORDER**

2 The Court, having reviewed the above stipulation, finds good cause exists to re-note the  
3 parties' respective Motions for Partial Summary Judgment (Dkt. # 119 and Dkt. # 124) from June 7,  
4 2019, to June 14, 2019, and extend the deadline for Defendants' reply brief to June 13, 2019.

5 DATED this 6th day of June, 2019.

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8 Thomas S. Zilly  
9 United States District Judge

10 Presented by:

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